

U.S. Department of Justice

Civil Division

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Washington, DC 20530

May 8, 2025

Honorable Lee Rosenthal United States District Court for the Southern District of Texas 515 Rusk Avenue Houston, Texas 77002

> Re: United States v. Jetall Companies, Inc. and Mohammed Ali Choudhri,

No. 4:23-mc-01644 (S.D. Tex.)

Dear Judge Rosenthal,

We write to follow up on our letter of April 24, 2025 (ECF No. 87) and to reiterate our request for an immediate conference via Zoom with the Court. The United States again respectfully requests that the Court hold Respondents in contempt for their failure to comply with this Court's Orders issued on March 20, 2025 (ECF No. 63), March 28, 2025 (ECF No. 71), and April 4, 2025 (ECF No. 73).

Respondents have not produced the Jetall Companies email, and it has now been more than two weeks since the United States received any communication from Respondents or their counsel Mark Bennett. The last communication was on April 22, 2025. See ECF No. 87 at Ex. A. Judge Jeffrey Norman released Mr. Choudhri from custody on April 24, 2025, and still we have received no communication. The United States emailed Mr. Bennett on May 6, 2025, requesting an update, but we received no response. Respondents have provided no updates at all about their efforts to comply with this Court's orders or produce the variety of documents in addition to email still outstanding in response to the United States' subpoenas.

This saga must come to an end. See In re Off. of Inspector Gen., R.R. Ret. Bd., 933 F.2d 276, 277 (5th Cir. 1991) (noting that judicial review of an administrative subpoena in an enforcement action is to be handled "with dispatch"). The Petition in this case was filed 588 days ago, on September 27, 2023. This Court's first Order to Show Cause compelling Respondents to take certain actions to comply with the subpoenas was issued 261 days ago on August 19, 2024. ECF No. 32. Respondents have never issued any objections to the subpoenas. They have simply refused to comply with them.

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This Court and the United States have done everything possible to coax Respondents to comply with their obligations. It is unfair to both the Court and the United States that we continue to expend time and resources chasing Respondents to comply with their obligations. Due to Respondents' continued non-compliance with multiple Court orders, the United States again requests that this Court hold Respondents in civil contempt and sanction each Respondent \$500 per day, assessed jointly and severally, through the date Respondents comply in full with this Court's orders.

Please do not hesitate to contact us if the Court has any questions.

Respectfully,

/s/ Anthony Gill

Anthony Gill

cc: Counsel of record via ECF